



Cal-IPC
California Invasive Plant Council

1442-A Walnut St., #462
Berkeley, CA 94709
(510) 843-3902
fax (510) 217-3500
www.cal-ipc.org
info@cal-ipc.org

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*(Affiliations for identification
purposes only)*

March 12, 2007

McKinley Addy, P.E.
California Energy Commission
Fuels and Transportation Energy Division
1516 Ninth Street, MS-41
Sacramento, CA 95814

Dear McKinley,

I am writing on behalf of the California Invasive Plant Council to provide comment on the Full Fuel Cycle Assessment report for implementation of AB 1007 (Pavley).

Cal-IPC serves the research and land management community focusing on reducing the environmental impact of invasive plants on California's natural areas. We partner with federal, state and local agencies on prevention and management strategies. We also partner with the nursery industry to prevent introductions of invasive plants through horticulture.

Environmental damage from invasive plants is significant. Conservative estimates place the national cost in the tens of billions of dollars each year. Invasive plants degrade native plant and wildlife habitat. They alter hydrology, soil chemistry, erosion processes and fire regimes. These impacts affect ecological services such as flood control, fire protection, recreation, water supply, and agriculture.

Many of the characteristics that make an attractive biofuel crop—such as quick production of biomass and little need for inputs—match the characteristics of invasive plants. Indeed, some of the plants being explored as possible biofuel crops are known to be invasive, while others raise significant concern.

It is vital that proposed biofuel crops be evaluated for their potential to invade natural areas. Existing evaluation criteria should be employed and refined to best determine risk. Cal-IPC has a criteria system for evaluating invasive plants already in the state based on their impact, ability to spread, and distribution. We are working with university

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researchers to develop predictive tools to evaluate the invasiveness potential of plants not currently introduced. Australia has a well-developed screening protocol for proposed new imports, and this protocol serves as a foundation for additional refinement.

Though such evaluation is vital and provides valuable information, it must also be recognized that this information is not always able to render a definitive judgment. (Even after a plant has been introduced, decades may be required before we know what it is capable of, given the “lag phase” that often precedes a species becoming invasive in a new location.) Thus, it may be necessary to establish monitoring protocol to ensure that a biofuel crop does not become invasive, and to establish a mechanism for adjusting practices and/or mitigating damages if the plant does become invasive.

Cal-IPC recommends that the full analysis of alternative fuels requiring cultivation of a crop should include: (1) an assessment of the potential for the crop plant to be invasive in California’s natural areas, and (2) an assessment of the potential damage the crop plant could cause if it becomes invasive. These assessments in turn should inform the overall risk analysis of that fuel crop, as well as the design of measures to minimize the risk and to mitigate any damage that does occur.

Please contact me if you have any questions. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Doug Johnson". The signature is written in a cursive, flowing style.

Doug Johnson
Executive Director